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2 David C. Neu, WSBA # 33143
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6 Seattle, WA 98104-1158
7 (206) 623-7580

Honorable Christopher M. Alston
Chapter 11
Hearing Location: Seattle, Rm. 7206
Hearing Date: September 1, 2017
Hearing Time: 9:30 a.m.
Response Date: August 25, 2017

8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 In re:

12 NORTHWEST TERRITORIAL MINT, LLC,
13 Debtor.

14 Case No. 16-11767-CMA

15 DECLARATION OF CHRISTINE UNWIN IN
16 SUPPORT OF TRUSTEE'S SECOND
17 MOTION FOR ORDER GRANTING
18 AUTHORITY TO RETURN STORED
19 INVENTORY TO CUSTOMERS

20 I, Christine Unwin, hereby declare as follows:

21 1. I submit this Declaration in support of the Trustee's Second Motion for Order
22 Granting Authority to Return Stored Inventory to Customers (the "Motion"). I am over eighteen
23 (18) years of age, and I am competent in all ways to testify.

24 2. I am a consultant for Cascade Capital Group, LLC. I have more than 15 years
25 experience as a business operations executive. On April 11 and April 12, 2016, I led the inventory
26 process at Northwest Territorial Mint, LLC's ("NWTM" or the "Debtor") Dayton, Nevada facilities
(the "Dayton Office"). In connection with my inventory of precious metals at the Dayton Office, I
secured and identified inventory marked as storage inventory for specific customers (the "Stored
Inventory"). I took photographs of inventory located at the Dayton Office or supervised the work of
two Dayton Office employees who also took pictures. On a site visit to the Dayton Office on June 8

27 DECLARATION OF CHRISTINE UNWIN IN SUPPORT
28 OF SECOND MOTION FOR ORDER GRANTING
29 AUTHORITY TO RETURN STORED INVENTORY - 1

30 500481449 v3

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1 and June 9, 2016 I verified inventory photographs sent to me and confirmed that inventory remained
2 in the original vault location recorded on April 11, 2016. In particular, I confirmed the existence,
3 identification and location of certain Stored Inventory.

4 2. Through my personal inspection of the inventory in the Dayton Office, I identified
5 two 100 oz. silver bars which were located on a shelf in the lower right center of the Dayton Office
6 vault (number 38 on the schematic attached hereto as Exhibit A). The bars were stored together with
7 a receipt identifying them to Dr. and Mrs. Richard Pehl. Photographs of the bars and receipt are
8 attached hereto as Exhibit B.

9 3. While conducting the inventory, I also located a Centennial Car Ingot Collection Set
10 (the "Car Ingot Set") located on the top shelf in the rear-right portion of the vault (number 24 on
11 Exhibit A). The Car Ingot Set did not have any paperwork with it that identified it to a particular
12 customer. I was told by one of the employees that Ross Hansen had informed him that the area in
13 the vault where the Car Ingot Set was located "belonged to him (Ross)" and that the employee "was
14 not to inventory it". Accordingly, the items found in location number 24 along with surrounding
15 items discovered in this section of the vault, were classified as Third-Party Related Dispute with
16 ownership to be determined after investigation. A photograph of the Car Ingot Set is attached hereto
17 as Exhibit C.

18 I declare under the penalty of perjury under the laws of the United States that the foregoing is
19 true and correct to the best of my knowledge.

20 EXECUTED this 1st day of August, 2017, at Bellevue, Washington.

21 
22

23 Christine Unwin
24
25
26

DECLARATION OF CHRISTINE UNWIN IN SUPPORT
OF SECOND MOTION FOR ORDER GRANTING
AUTHORITY TO RETURN STORED INVENTORY - 2

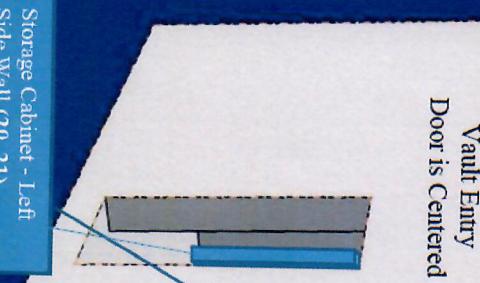
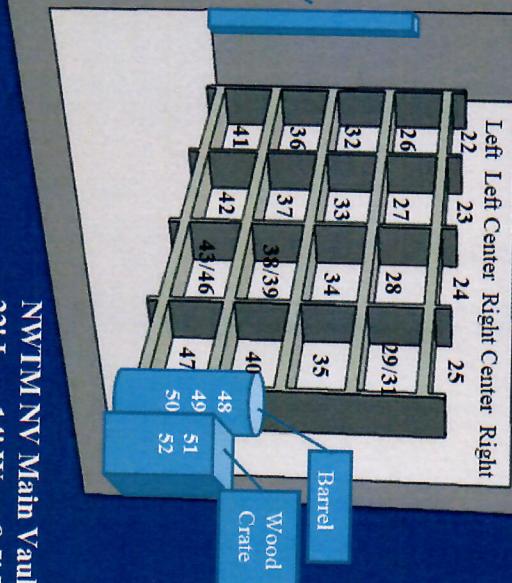
500481449 v3

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EXHIBIT A

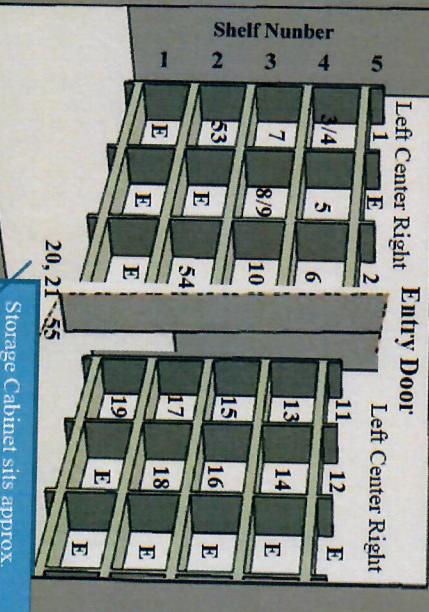
NEVADA VAULT INVENTORY: LOCATION and CONTENTS RECORDED APRIL 11, 2016

Nevada Inventory by Vault Location - REAR WALL



Nevada Inventory by Vault Location - FRONT ENTRY WALL

NWTM NV Main Vault:
22' L x 14' W x 8.5' H



Storage Cabinet sits approx.
here (see upper drawing)

E = Empty Shelf

No.	Labeled	Status / Ownership	No.	Labeled	Status / Ownership
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1	NWTM Samples	Mint Owned	36	Presumed Hansen	3rd Pty Rel. Disp.
2	NWTM Samples	Mint Owned	37	Empty	N/A
3	NWTM Archives	Mint Owned	38	Pehl Storage	Dr/Mrs. Pehl
4	NWTM Samples	Mint Owned	39	Mulbauer Storage	F. Mulbauer
5	NWTM Samples	Mint Owned	40	Knives+Die Set	Mint Owned
6	Blanchard Storage D. Blanchard		41	Paolucci Storage	D/M Paolucci
7	NWTM Samples	Mint Owned	42	Paolucci Storage	D/M Paolucci
8	Sales Samples	Mint Owned	43	D.Erdman UPS	3rd Pty Rel. Disp.
9	Coin Samples	Mint Owned	44	D.Erdman UPS	3rd Pty Rel. Disp.
10	Empty Boxes	Mint Owned	45	D.Erdman UPS	3rd Pty Rel. Disp.
11	Steel Filling Tools	Mint Owned	46	D.Erdman UPS	3rd Pty Rel. Disp.
12	Empty Coin Tubes	Mint Owned	47	Goldpanner Round	Mint Owned
13	Sales Samples - br	Mint Owned	48	Scrap Buckets	Mint Owned
14	Empty Tray	Mint Owned	49	Scrap Barrel	Mint Owned
15	Sterling Award	S Mint Owned	50	Scrap Bucket Left	Mint Owned
16	Sales Samples	Mint Owned	51	H.Toomey/F.House	3rd Pty Rel. Disp.
17	NWTM Scrap	Mint Owned	52	D.Routh, presumed	3rd Pty Rel. Disp.
18	NWTM Scrap	Mint Owned	53	Empty	(Formerly Ariel)
19	NWTM Scrap	Mint Owned	54	Empty	N/A
20	S. Firebaugh	3rd Pty Rel. Disp.	55	12 Strips Zirconium	Mint Owned
21	Floor Cabinet	Mint Owned			
22	Presumed Hansen	3rd Pty Rel. Disp.			
23	Presumed Hansen	3rd Pty Rel. Disp.			
24	Presumed Hansen	3rd Pty Rel. Disp.			
25	Presumed Hansen	3rd Pty Rel. Disp.			
26	Presumed Hansen	3rd Pty Rel. Disp.			
27	State Coins (50 Sf)	Mint Owned			
28	State Coins (50 Sf)	Mint Owned			
29	Box	Mint Owned			
30	Empty	N/A			
31	Lapel Pin Boxes	Mint Owned			
	Old Vehicle	Owned,			
	Trackers,	3rd Pty Rel.			
32	Presumed Hansen	Disp.			
33	Niobium Scrap+Ni	Mint Owned			
34	Russell Storage	Aaron Russell			
35	Sales Samples	Ki Mint Owned			

**NWTM Dayton, NV Plant - Estimated 100,000 Square Feet
MAIN VAULT AND FLOOR VAULT LOCATIONS**

Estimate - Not to Scale

Smart Home Security Camera

LOADING DOCKS

Security Gate

WEST M

EXTRUDER
E Z Z A N I N E

NGC 2518

RECEIVING
SHIPPING

Security
Camera

ANNEALING OVENS

MANAGEMENT

Motion Video Security Camera

2

COINING PROCESSES

SPINNING PRESSSES

DIE STORAGE

31

1st Level Fire Extinguisher Locations

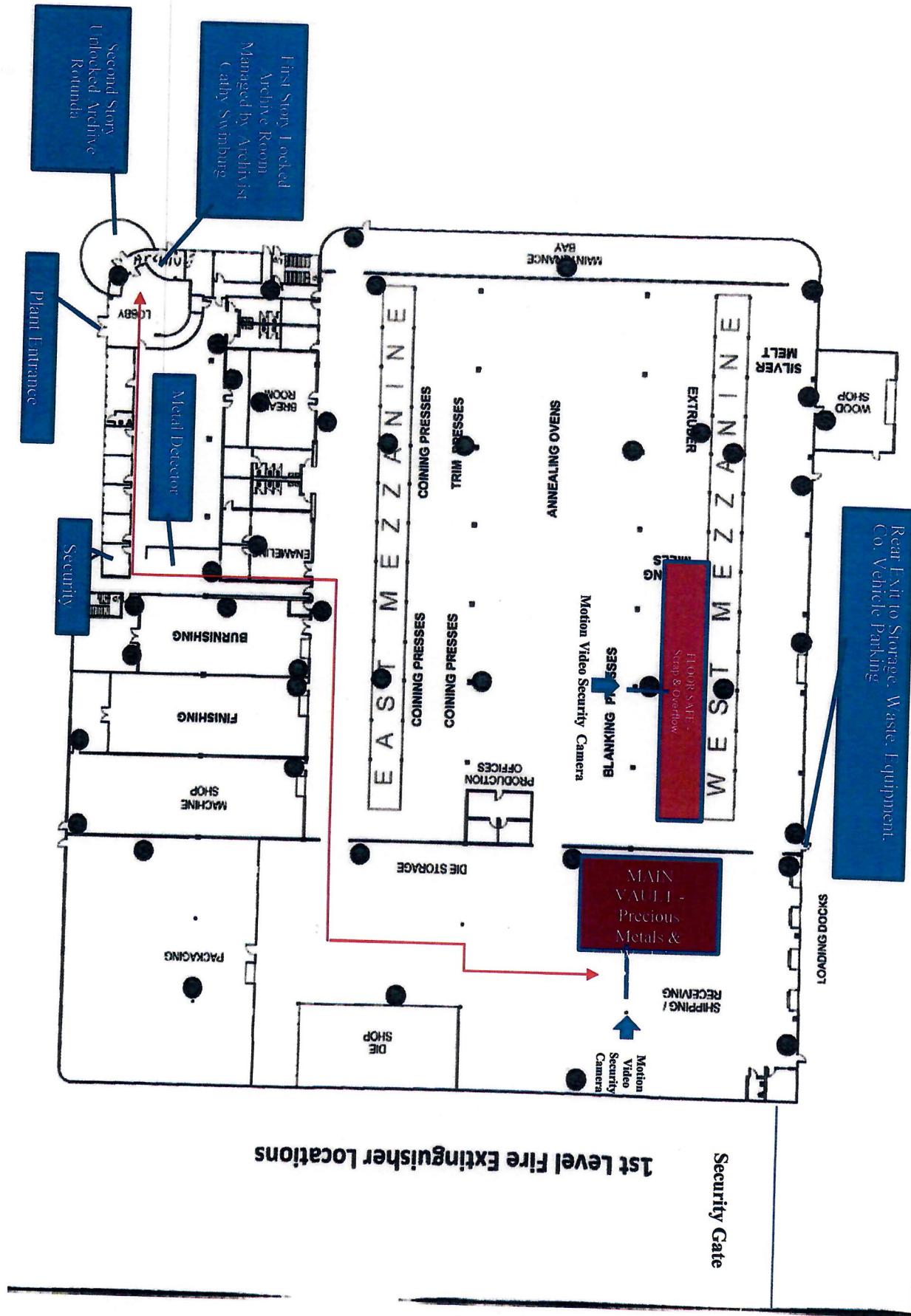


EXHIBIT B



title IMG_4503.JPG

PEHL #38

date June 9, 2016 at 4:19:59 PM

filename IMG_4503.JPG

camera iPhone 6

1/30 | f/2.2 | 4.2 mm | ISO: 200 | Flash: Yes



title IMG_4425.JPG

DEHL #38

date June 9, 2016 at 3:34:35 PM

filename IMG_4425.JPG

camera iPhone 6

1/30 | f/2.2 | 4.2 mm | ISO: 200 | Flash: Yes



999⁺
FINE
SILVER

1625/2091

554
1790

100
TROY OUNCE

IN GOD WE TRUST



013948

1 x 100
TROY OUNCE
SILVER BAR



THE AMERICAN TRADITION IN PRECIOUS M

ENGELHARD

999+ FINE SILVER 100 TR

COIN FUND

P724208

EXHIBIT C



title

description

date April 14, 2016 at 1:34:20 PM

keywords #24 NV Vault

filename vault 082.JPG

camera Canon PowerShot ELPH 115 IS

1/20 | f/3.2 | 5 mm | ISO: 640 | Flash: Yes